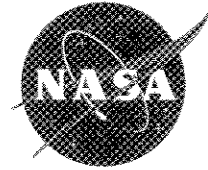


National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



February 9, 2011

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA employees at "Leading Through Challenging Times" Breakfast Event on February 10, 2011

On February 10, 2011, Alvarez & Marsal will host a breakfast event on the topic of "Leadership Through Challenging Times" at the Willard Hotel, 1401 Pennsylvania, N.W., in Washington, D.C. This event will include a discussion of the lessons learned from the financial crisis, its effect on the Nation's financial stability, and the implications for the Government's ability to regulate and function. The speaker is Bryan Marsal, Co-CEO, Alvarex & Marsal.

Approximately, 778 invited guests include representatives of NASA, industry, not-for-profit organizations, personnel from other Government agencies, academia, and members of the public. This breakfast event will be held from 8:00 AM – 9:30 AM, and light refreshments valued at approximately \$30.00 per person will be served.

I find that the event meets the requirements of a "widely-attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2). I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the event will allow NASA attendees to exchange information regarding various NASA programs.

NASA employees whose duties do not substantially affect Alvarez & Marsal, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation for themselves and an invited guest for free attendance to the event.

However, NASA employees whose duties may substantially affect Alvarez & Marsal, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone